

Before the
Communications Commission
Washington, D.C. 20554

In the Matter of)
)
 REVITALIZATION OF THE AM RADIO SERVICE) MB Docket No. 13-249
)

To: The Commission

Comments of BAS Broadcasting, Inc.

BAS Broadcasting, Inc. (“BAS Broadcasting”), by counsel, hereby submits these Comments in response to the *Revitalization of the AM Radio Service*, First Report and Order, Further Notice of Proposed Rule Making, and Notice of Inquiry, FCC 15-142, released October 23, 2015, (“NPRM”). These comments specifically address the NPRM’s proposed modification of 47 C.F.R. Section 74.1201(g) of the Commission’s rules.

BAS Broadcasting is the licensee of the following AM stations:

WLEC, Sandusky, Ohio, Facility Id. Number 19705

WMVO, Mount Vernon, Ohio, Facility Id. Number 74474

BAS Broadcasting is also a participant in the AM Station Filing Window for FM Translator Modifications and is currently the permittee of FM Translator W265DJ, Mount Vernon, Ohio, which BAS Broadcasting intends relocate in order to rebroadcast the signal of AM station WMVO.

BAS Broadcasting is directly interested in the proposals the Commission set forth in the NPRM by virtue of its position as licensee of two AM stations and a participant in the recent AM Station Filing Window for FM Translator Modifications.

BAS Broadcasting commends the Commission for its efforts to improve the AM service. In particular, BAS Broadcasting supports the Commission's proposal to modify Section 74.1201(g) of its rules to allow AM stations operating fill-in FM translators to contain their contour "within the *greater* of either the 2 mV/m daytime contour of the AM station or a 25-mile (40 km) radius centered at the AM transmitter site."¹ By revising the rule's existing language from "lesser" to "greater," the Commission will allow all AM broadcasters utilizing fill-in FM translators, including BAS Broadcasting, to provide improved service to their core market areas.

BAS Broadcasting respectfully requests that the FCC move swiftly in adopting non-controversial modifications that can provide immediate benefits to AM broadcasters nationwide, such as the revision to Section 74.1201(g) of its rules, while the Commission continues to evaluate the more complicated portions of the NPRM.

Respectfully submitted,

BAS BROADCASTING, INC.



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¹ First Report and Order, pp. 68 (*emphasis added*).